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**Via ECF**

Hon. Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Rahman, et ano v. July 96 Corp., et al.*  
Case No. 21-cv-9649**

Dear Judge Torres:

I write on behalf of Plaintiffs Mohammad Rahman and Jose Vargas to respectfully request that the Court approve the revised settlement agreement, submitted on July 21, 2022, as fair and reasonable under *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d Cir. 2015).

On June 1, 2022, the parties submitted a joint letter motion seeking approval of the settlement. (Dkt. No. 25). In response to the Court identifying deficiencies in the settlement, (Dkt. No. 31), on July 21, 2022, Plaintiffs submitted a revised settlement agreement, along with a letter motion, seeking settlement approval from the Court. (Dkt. No. 32). On December 16, 2022, in response to a letter from Plaintiffs, the Court issued an order confirming that the parties' submissions were sufficient and stating that the Court will issue an order regarding the parties' request for approval of settlement in due course. (Dkt. No. 34).

On May 19, 2023, Plaintiffs filed a letter requesting that the Court approve the revised settlement agreement, and informed the Court that the Plaintiffs in this case are two elderly gentlemen who have worked their entire lives in minimum wage positions and are eager to receive the settlement payments in this matter. (Dkt. No. 35). The Plaintiffs are hopeful that the Court will approve the revised settlement, which was submitted to the Court over 14 months ago.

We thank the Court for its careful consideration of this matter, and respectfully request that the Court approve the revised settlement agreement as fair and reasonable.

Respectfully Submitted,

/s/Michael DiGiulio

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